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Attorneys for Google LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,
Plaintiff,
vs.
SONOS, INC.,
Defendant

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS REPLY IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
 7 Seal Portions of its Reply in Support of Motion for Summary Judgment (“Reply”). If called as a
 8 witness, I could and would testify competently to the information contained herein.

9 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Reply	Portions highlighted in yellow	Google
Exhibit 3 to Google's Reply	Portions outlined in red boxes	Google

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 15 4. The portions of Google’s Reply highlighted in yellow and the portions of Exhibit 3
 16 outlined in red boxes contain references to Google’s confidential business information and trade
 17 secrets, including details regarding architecture and technical operation of Google’s products and
 18 functionalities that Sonos accuses of infringement. The specifics of how these functionalities operate
 19 is confidential information that Google does not share publicly. Thus, public disclosure of such
 20 information could lead to competitive harm to Google as competitors could use these details regarding
 21 the architecture and functionality of Google’s products to gain a competitive advantage in the
 22 marketplace with respect to their competing products. I also understand that a less restrictive
 23 alternative than sealing these documents would not be sufficient because the information sought to be
 24 sealed is Google’s confidential business information and trade secrets but is necessary to Google’s
 25 Reply.

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1 I declare under penalty of perjury under the laws of the United States of America that to the
2 best of my knowledge the foregoing is true and correct. Executed on February 28, 2023, in San
3 Francisco, California.

4 DATED: February 28, 2023

5 By: /s/ Jocelyn Ma
6 Jocelyn Ma

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ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: February 28, 2023

/s/ Charles K. Verhoeven
Charles K. Verhoeven